

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:25-cv-22896-KMW

FRIENDS OF THE EVERGLADES, INC., a Florida not-for-profit corporation, and CENTER FOR BIOLOGICAL DIVERSITY, a 501(c)(3) nonprofit organization,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as Secretary of the UNITED STATES DEPARTMENT OF HOMELAND SECURITY; TODD LYONS, in his official capacity as Acting Director of the UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT; KEVIN GUTHRIE, in his official capacity as Executive Director of the Florida Division of Emergency Management; and MIAMI-DADE COUNTY, a political subdivision of the State of Florida,

Defendants.

and

THE MICCOSUKEE TRIBE OF INDIANS,

Proposed Intervenors.

**PLAINTIFFS' EXPEDITED REQUEST FOR PRODUCTION
TO STATE DEFENDANT**

Pursuant to Fed. R. Civ. P. 34, Plaintiffs Friends of the Everglades, Inc., and Center for Biological Diversity (collectively, "Plaintiffs"), through undersigned counsel, hereby request that the following documents be produced for inspection and copying by Defendant Kevin Guthrie, in

his official capacity as Executive Director of the Florida Division of Emergency Management, within seven (7) days.

REQUESTS FOR DOCUMENTS

1. Any agreements between Immigration and Customs Enforcement (“ICE”), the U.S. Department of Homeland Security (“DHS”), FEMA, or both, and the Florida Division of Emergency Management (“FDEM”), or any other state or local government office, pursuant to section 287(g) or any other provision of the Immigration and Nationality Act, applicable to the use of the Dade-Collier Training and Transition Airport (“TNT site”) as a detention center.
2. A copy of any Intergovernmental Service Agreements (“IGSA”), Memorandum of Understanding, or the like, among FDEM and ICE or DHS or FEMA related to the TNT site.
3. Communications between FEMA, and ICE and/or DHS and FDEM or any other State of Florida official or employee relating to the use of the TNT site as a detention center.
4. A copy of any IGSA between ICE and any other state or local government office related to the TNT site.
5. A copy of any Basic Ordering Agreements (“BOA”) between ICE and FDEM.
6. A copy of any BOAs between ICE and any other state or local government office.
7. Communications between FDEM and Miami-Dade County pertaining to FDEM’s Letter of Intent (“LOI”) in connection with the proposed acquisition of the Dade-Collier Training and Transition Airport (“TNT”) and/or in connection with FDEM’s utilization of the TNT Site.
8. All documents pertaining to or discussing the environmental impacts of any use of the TNT site as an immigrant detention center.
9. All documents pertaining to or discussing the impacts on any listed endangered species or critical habitat resulting from FDEM’s use of the TNT site.
10. All documents pertaining to or demonstrating any water, power, traffic planning, incineration, sewer and sewage disposal, wetlands mitigation, or related infrastructure plans relating to the use of the TNT site as a detention center.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 23, 2025, I served the foregoing document via
Electronic Mail on all counsel of record identified below.

s/ Paul J. Schwiep

Service List	
<p>Nathan A. Forrester Chief Deputy Solicitor General nathan.forrester@myfloridalegal.com</p> <p>Robert S. Schenck Assistant Solicitor General robert.schenck@myfloridalegal.com Office of the Attorney General The Capitol, PL-01 Tallahassee, Florida 32399-1050 Telephone: (850) 414-3300 jenna.hodges@myfloridalegal.com</p> <hr/> <p>BOIES SCHILLER FLEXNER LLP Jesse Panuccio, Esq. jpanuccio@bsflp.com Evan Ezray, Esq. eezray@bsflp.com 401 East Las Olas Boulevard, Suite 1200 Fort Lauderdale, Florida 33301 Telephone: (954) 356-0011</p> <p><i>Counsel for Defendant Kevin Guthrie, in his official capacity as Executive Director of the Florida Division of Emergency Management</i></p>	<p>HAYDEN P. O'BYRNE United States Attorney Carlos J. Raurell Assistant U.S. Attorney carlos.raurell@usdoj.gov 99 Northeast 4th Street Miami, Florida 33132 Telephone: (305) 961-9243 melissa.Jiminson@usdoj.gov</p> <hr/> <p>ADAM R.F. GUSTAFSON Acting Assistant Attorney General Environment and Natural Resources Division United States Department of Justice Peter M. Torstensen, Jr. Deputy Assistant Attorney General Environment and Natural Resources Division United States Department of Justice Hayley A. Carpenter Trial Attorney hayley.carpenter@usdoj.gov Natural Resources Section Ben Franklin Station P.O. Box 7611 Washington, D.C. 20044-7611 Telephone: (202) 305-0242</p> <p><i>Counsel for Kristi Noem, in her official capacity as Secretary, United States Department of Homeland Security, and Todd Lyons, in his official capacity as Acting Director, United States Immigration and Customs Enforcement</i></p>
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